

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS**

IN RE:

Kevin Redmond

Debtor(s)

) Case No. 20-07737  
)  
) Chapter 13  
)  
) Judge Jacqueline P. Cox  
)  
) Hearing: 9/28/2020 at 9:00 a.m.

**NOTICE OF OBJECTION TO CLAIM 05**

TO: All Persons/Entities Indicated on the Attached Service List

PLEASE TAKE NOTICE that on 9/28/2020 at 9:00 a.m., I will appear before the Honorable Judge Jacqueline P. Cox, or any judge sitting in that judge's place, and present the motion of Debtor to Dismiss, a copy of which is attached.

**This motion will be presented and heard telephonically.** No personal appearance in court is necessary or permitted. To appear and be heard telephonically on the motion, you must set up and use an account with Court Solutions, LLC. You can set up an account at [www.CourtSolutions.com](http://www.CourtSolutions.com) or by calling Court Solutions at (917) 746-7476.

**If you object to this motion** and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

Dated: 8/28/2020

**Kevin Redmond**

/s/ Michael N. Oreluk  
By: Michael N. Oreluk

Michael N. Oreluk  
ERWIN LAW, LLC  
4043 N. Ravenswood  
Suite 208  
Chicago, IL 60613  
(773) 525-0153

**CERTIFICATE OF SERVICE**

I hereby certify under penalty of perjury that on 8/28/2020 I mailed a copy of this notice, along with the attached motion and order, to all persons/entities listed on the attached service list by depositing same in a U.S. Post Office Box located in New Orleans, Louisiana, postage prepaid, except that service was provided to the Chapter 13 Trustee and the United States Trustee through electronic notice via the Clerk of the Bankruptcy Court's ECF system.

/s/ Michael N. Oreluk

SERVICE LIST

VIA US MAIL  
Webcollex LLC D/B/A CKS Financial  
PO Box 2856  
Chesapeake, VA 23327-2332

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NORTHERN DISTRICT OF ILLINOIS**

IN RE: ) Case No. 20-07737  
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Kevin Redmond ) Chapter 13  
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Debtor(s) ) Judge Jacqueline P. Cox  
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**OBJECTION TO CLAIM 05**

NOW COMES Debtor, by and through Debtor's counsel Michael N. Oreluk, and for Debtor's Objection to Claim 06, states as follows:

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §1334. This matter is a core proceeding within the meaning of 28 U.S.C. §157(b)(2). Venue is proper in this Court pursuant to 28 U.S.C. §1409(a).
2. The petition was filed on March 18, 2020.
3. Webcollex LLC D/B/A CKS Financial filed a Proof of Claim as Claim No. 05 (hereinafter the "Claim"). Said Claim is attached hereto as Exhibit A.
4. The Claim is based upon credit card debt.
5. The Claim is based upon a debt that was charged off on November 5, 2012.
6. The Claim is based upon a debt for which the last payment was made on November 28, 2012.
7. The Claim is barred by the five year Illinois Statute of Limitations for credit debt, as both the last use of the credit card and the last payment was over five years ago.

WHEREFORE, Debtor respectfully requests that this Court sustains Debtor's Objection to Claim 05 and enters the attached proposed order, and for such other and further relief this Court deems fair and just.

Dated: 8/28/2020

Respectfully submitted,  
**Kevin Redmond**

/s/ Michael N. Oreluk  
By: Michael N. Oreluk

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ERWIN LAW, LLC  
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Suite 208  
Chicago, IL 60613  
T: (773) 525-0153  
F: (773) 525-0154  
moreluk@erwinlawfirm.com